

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
No. 19 CR 567
-vs-)
Hon. Martha M. Pacold
ROBERT SYLVESTER KELLY,)
also known as "R.Kelly,")
Defendant.)

**SURREPLY TO SURRESPONSE TO THIRD SUPPLEMENT
TO EMERGENCY MOTION FOR TEMPORARY FURLough**

In its most recent filing (Dkt. 494), government counsel hypocritically attempts to downplay the threat against Mr. Kelly. Indeed, the government has not followed its own admonition in its jurisdictional memorandum. It strains credulity to believe that the government's *ad hominem* attacks against Mr. Kelly are in any way relevant to the jurisdictional issue. The increasingly imminent threat Mr. Kelly faces at the hands of Bureau of Prisons officials is a matter that the undersigned has an ethical obligation to bring to the Court's attention so that the Court is fully advised of the nature of the threat against Mr. Kelly and prepared to proceed in the event it agrees with Mr. Kelly on the jurisdictional issue.

It may be preferable to government counsel for government corruption to be shielded from the eyes of the Court and the public. But actions by Bureau of Prisons officials demonstrate that the danger Mr. Kelly faces is not fanciful. It is not unserious. It is not theatrical. The danger Mr. Kelly faces at the hands of Bureau of Prison officials is very real, and it grows more and more dire with each passing day. So long as that remains the case, the undersigned must continue to advocate for the safety of his client.

Respectfully submitted,

By: /s/ Beau B. Brindley
Attorney for the Defendant

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